



September 15, 2008

OSHA Docket Office
Docket Number OSHA-2008-0031
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, NW
Washington, DC 20210

Re: Docket ID OSHA-2008-0031

Docket Officer:

The American Industrial Hygiene Association (AIHA) appreciates the opportunity to comment on the OSHA Proposed Rule to clarify requirements to provide personal protective equipment and train employees. The proposed rule was published in the *Federal Register* on August 19, 2008.

As the premier association of occupational and environmental health and safety professionals, AIHA members serve on the front line of worker health and safety. AIHA members, as well as employees and employers, rely on federal and state rules and regulations to improve the health and safety of the workplace and believe the issue of providing personal protective equipment, including respirators, to protect employees from injury and illness caused by exposure to toxic substances and other workplace hazards is of the utmost importance.

The AIHA Respiratory Protection Committee reviewed the Proposed Rule and is in agreement that the proposed amendments do not impose any new substantive requirements. The Committee is also in agreement that the proposed rule adds no new compliance burden.

Specifically, the AIHA Committee agrees with the proposed amendments to the respirator and training provisions in the standards in parts 1910 through 1926 to:

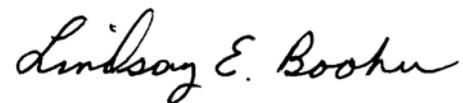
- Revise the language of the initial respirator paragraphs adopted in the 1998 rule to explicitly state that the employer must provide each employee an appropriate respirator and implement a respiratory protection program for each employee,
- Revise the language of initial training paragraphs that require the employer to institute or provide a training program to explicitly state that the employer must train each employee, and
- Add a new section to the introductory subparts to clarify those standards requiring the employer to provide PPE or training, impose a separate compliance duty to each employee and that each employee who does not receive the required PPE or training may be considered a separate violation.

AIHA also urges the Department of Labor and OSHA to move forward with the completion of this proposed rule in as timely a manner as possible to avoid any potential delays in the protection of workers.

AIHA appreciates the opportunity to work with OSHA to help achieve the mutual goal of protecting workers from injury and illness caused by exposure to toxic substances and other workplace hazards. We look forward to further opportunities to work with the agency on this and similar issues and regulatory priorities.

If AIHA can be of any further assistance, please contact me. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Lindsay E. Booher".

Lindsay E. Booher, CIH, CSP
AIHA President

cc: AIHA Board of Directors
AIHA Respiratory Protection Committee